

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION	)	MDL 2804
OPIATE LITIGATION	)	
	)	Case No. 1:17-md-2804
THIS DOCUMENT RELATES TO:	)	
	)	Judge Dan Aaron Polster
<i>Applies to All Cases</i>	)	

**KVK-TECH, INC.'S STATUS REPORT**

KVK-Tech, Inc., through its undersigned attorneys, and for its Status Report pursuant to the Court's June 22, 2022 Order states as follows:

Following the last status conference for the small manufacturer and small distributor group of defendants, KVK-Tech engaged in a productive meet and confer with the Plaintiff's Executive Committee. The major item under discussion between the parties is the scope of pre-discovery information that will be shared in order to facilitate settlement negotiations. The PEC requested in their first status report (Doc. No. 4545) that all defendants produce nine separate categories of documents. A substantial majority of these are documents which KVK-Tech has already produced in state court litigation and are therefore available to the PEC.

KVK-Tech and the PEC are in the process of negotiating the production of additional documents in a manner that would accomplish the goal of facilitating settlement yet also protecting the documents' confidentiality. Drafts of a confidentiality agreement have been exchanged between KVK-Tech and the PEC and they are in the process of being finalized and executed.

Once this is completed, KVK-Tech expects that additional negotiations can proceed. In light of the progress made thus far, KVK-Tech continues to believe that setting cases for bellwether trials would detract from rather than foster settlement potential.

Dated: September 21, 2022

Respectfully submitted,

/s/ Thomas E. Rice

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**ATTORNEY FOR DEFENDANT  
KVK-TECH, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing was filed with the Clerk of the Court using the CM/ECF system on this 21st day of September, 2022, which will send notification of the same to all counsel of record.

/s/ Thomas E. Rice